17. In the response to question 29, MDE appreciates the additional detail on avoidance and minimization of impacts to wetlands and waterways resources. However, please provide additional explanation of the specific screening criteria used to evaluate route variations.

Response:

AES applied several screening criteria to identify a proposed route between the Terminal Site and the interconnection points near Eagle, Pennsylvania. Principal among its route screening criteria was the desire to maximize use of existing rights-of-way ("ROWs") in order to avoid or to minimize to the maximum extent practicable construction-related impacts to the environment, landowners, and other stakeholders, taking into consideration the technical and economic feasibility of constructing the Pipeline. Although not the only criterion used in route selection, the preference towards the use of existing corridors is an industry standard and consistent with 18 CFR §380.15, which concerns siting and maintenance requirements for pipeline construction. Furthermore, this criterion is consistent with the objectives of most regulatory agencies, including the ACOE and the FERC.

Specifically, AES assessed each route alternative using a 100-foot wide corridor centered on the proposed alignment for the majority of the constraints. The analysis was conducted using existing resource information available on United States Geological Survey ("USGS") 7.5-minute series topographic quadrangle maps; Maryland Geographic Information System ("GIS") data layers; other available federal, state, and county resource maps; recent high resolution aerial photography; and unmapped data. The analysis focused on an evaluation of:

- Route length
- Feasibility of using existing corridors
- Need for crossing existing transportation features
- Presence of wetlands and waterbodies
- Presence of threatened and endangered species and significant habitat
- Presence of cultural resources
- Specific land uses and vegetation cover types
- Presence of Federal, state, local and other public lands
- Proximity to residential and commercial development
- Presence of paleontological resources,
- Other special land uses such as trails, landfills, quarries, golf courses, parks, schools, etc.

Minor route variations on the proposed route were identified in response to issues raised by the public, engineering and environmental constraints identified during field surveys, and other issues of concern. Each potential variation on the proposed route was evaluated according to key environmental and engineering parameters to arrive at a preferred route through the area of concern. The purpose for developing route variations was to further refine the proposed route in areas of potential significant impacts, including heavily congested and environmentally sensitive areas. Areas for focused route variations were identified during the course of public meetings, by landowners, during AES field surveys, and through regulatory agency input.

The process for identifying and evaluating route variations is iterative in that one variation may generate another variation until the optimal route is finally identified. This identification may continue to take place even during the construction phase.